NEW MEXICO
ENVIRONMENT DEPARTMENT

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BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

Certified Mail - Return Receipt Requested

July 5, 2018

The Honorable Nelson Kotiar, Mayor
City of Santa Rosa
244 S 4th St
Santa Rosa, NM 88435-2323

Re: **City of Santa Rosa Wastewater Treatment Plant (WWTP; SIC 4952; NPDES Compliance Evaluation Inspection; NPDES Permit No. NM0029948; Inspection Date: June 21, 2018**

Dear Mr. Kotiar:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, detailed site observations, and findings noted during this inspection are discussed in the "further explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

David Long
US Environmental Protection Agency, Suite 1200
Enforcement Branch (6EN-WS)
1445 Ross Avenue
Dallas, Texas 75202-2733

Sarah Holcomb, Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Sandra Gabaldón at (505) 827-1041 or at Sandra.gabaldon@state.nm.us

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Surface Water Quality Bureau

Cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Darlene Whitten-Hill, USEPA (6EN-WC) by e-mail
Nancy Williams, USEPA (6EN-WC) by e-mail
John Rhoderick, District I, NMED by e-mail

SH/sg

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	2	3	11	12	17	18	19	20
Transaction Code		NPDES		yr/mo/day		Inspec. Type	Inspector	Fac Type
N	5	NM0002498	8	180621			S	

Remarks: MINOR WWTP

67	69	70	71	72	73	74	75	80
Inspection Work Days		Facility Evaluation Rating	BI	QA			Reserved	
1		2	N	N				

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
SANTA ROSA WWTP –
Take 1-25 South to the I-40 East exit towards Santa Rosa; Turn Right onto NM 91; Turn right onto James Walls Power Dam Park. Follow the road to the facility. Entrance is made by calling operator; as the gate is locked. GUADALUPE COUNTY, NM

Entry Time /Date
10:05 Hours/ June 21, 2018

Permit Effective Date
October 1, 2016

Exit Time/Date
1200 Hours / June 21, 2018

Permit Expiration Date
September 30, 2021

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Mark Micelli, Wastewater Superintendent / (575) 799-8888 (cell)
Onofre Cordova, Operator

Other Facility Data
SIC 4952

Name, Address of Responsible Official/Title/Phone and Fax Number
Nelson Kotiar, Mayor / (575) 472-3404
244 S 4th St
Santa Rosa, NM 88435-2323

Contacted: Yes [ ] No [*]

OUTFALL 001:
N 34°55.559"
W -104°40.937"

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	M	Flow Measurement	U	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
M	Effluent/Receiving Waters	M	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. **Please see full inspection report for further details.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sandra Gabaldón /s/ *Sandra Gabaldón*	NMED/SWQB/(505) 827-1041/(505) 827-0160	July 5, 2018
Signature of Management QA Reviewer *?s/ Sarah Holcomb* Sarah Holcomb, Program Manager	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-2798/(505) 827-0160	Date July 5, 2018

City of Santa Rosa	NM0024988

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED Yes*)

DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	☒ Y ☐ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	☒ Y ☐ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED	☒ Y ☐ N ☐ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☐ S ☒ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED YES*)
DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	☒Y ☐ N ☐ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☒S ☐ M ☐ U ☐ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	☒ Y ☐ N ☐ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	☒ Y ☐ N ☐ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☒ Y ☐ N ☐ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☒ Y ☐ N ☐ NA
e) DATES AND TIMES OF ANALYSES.	☒ Y ☐ N ☐ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☒ Y ☐ N ☐ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	☒ S ☐ M ☐ U ☐ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	☐ S ☒ M ☐ U ☐ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☒ Y ☐ N ☐ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☐ S ☐ M ☒ U ☐ NA (*FURTHER EXPLANATION ATTACHED YES*)
DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.	☐ S ☒ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	☐ S ☐ M ☒U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .	☒ S ☐ M ☐ U ☐ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☒ S ☐ M ☐ U ☐ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE	☒ S ☐ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	☒ S ☐ M ☐U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	☒ Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	☒ Y ☐ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	☒Y ☐ N ☐ NA

City of Santa Rosa	PERMIT NO NM0024988

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	☐ Y ☐ N ☒ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	☐ Y ☒ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED YES).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☒ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	☒ Y ☐ N ☐ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	☒ Y ☐ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☒ Y ☐ N ☐ NA
b) PROPER PRESERVATION TECHNIQUES USED.	☐ Y ☒ N ☐ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	☒ Y ☐ N ☐ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☐ Y ☐ N ☒ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☐ S ☒ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED YES)*
DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE 6-inch Parshall flume	☒ Y ☐ N ☐ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	☒ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	☒ Y ☐ N ☐ NA
4. CALIBRATION FREQUENCY ADEQUATE.	☒ Y ☐ N ☐ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	☒ Y ☐ N ☐ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	☐ Y ☒ N ☐ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	☒ Y ☐ N ☐ NA
6. HEAD MEASURED AT PROPER LOCATION.	☒ Y ☐ N ☐ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	☒ Y ☐ N ☐ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☐ S ☒ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED YES)*
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	☒ Y ☐ N ☐ NA

City of Santa Rosa	PERMIT NO: NM0024988

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☒ S ☐ M ☐ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☐ S ☒ M ☐ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 0 % OF THE TIME. ☐ Y ☒ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. __ % OF THE TIME. ☐ Y ☐ N ☒ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

LAB NAME Tucumcari WWTP | Hall Environmental Laboratory | BioAquatics

LAB ADDRESS 215 East Center Street; Tucumcari, NM | 4901 Hawkins St NE, Albuquerque, NM 87109 | 2501 Mayes Rd; Ste 100 CARROLLTON, TX

PARAMETERS PERFORMED BOD, E. coli | Total Phosphorus; Total Nitrogen | Biomonitoring (WET)

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☐ S ☒ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	NO	NO	NO	YES	YES	CLEAR	

RECEIVING WATER OBSERVATIONS: Visible debris along with some foaming was seen at the outfall into the El Rito Creek.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED YES).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☐ S ☒ M ☐ U ☐ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☒ S ☐ M ☐ U ☐ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED _____).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☒ N ☐ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE ___ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☐ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☐ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☐ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☐ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☐ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☐ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☐ NA

City of Santa Rosa Wastewater Treatment Plant (WWTP)
NPDES Permit No. NM0024988
Compliance Evaluation Inspection
Date of Inspection: June 21, 2018

Introduction:

A compliance evaluation inspection (CEI) was conducted at the Santa Rosa Wastewater Treatment Plant (WWTP) on June 21, 2018 by Sandra Gabaldón and Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). The inspection was conducted by NMED for the U.S. Environmental Protection Agency (USEPA), Region 6, under the National Pollutant Discharge Elimination System (NPDES) permit program. The enclosed inspection report is based on verbal information provided by the permittee's representatives, Mr. Mark Micelli, Wastewater Superintendent, and Mr. Onfre Cordova, Operator, observations made by the NMED inspectors, and a review of records maintained by the permittee and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative further explanations section of the report.

The Santa Rosa WWTP is classified as a minor municipal discharger with a design flow of 0.454 million gallons a day (MGD) and is assigned NPDES permit number NM0024988. The discharge from the WWTP enters the El Rito Creek, in segment number 20.6.4.212, in the Pecos River Basin. The designated uses for this segment include: irrigation, coldwater aquatic life, livestock watering, wildlife habitat and primary contact.

Ms. Gabaldón and Mr. Valenta arrived at the facility and contacted Mr. Micelli. Mr. Micelli met with the inspectors at the facility at 1005 hours on June 21, 2018. Ms. Gabaldón presented her credentials and explained the purpose of the inspection. An exit conference was held with Messrs. Micelli and Cordova on this date to discuss preliminary findings of this inspection.

Treatment Scheme:

Influent enters the treatment plant by means of five lift stations throughout the City. Influent then travels through the grit chamber and the bar screen. The grit and bar screen debris is removed and placed in a dumpster to be taken to the Tucumcari Landfill. Method 9095B (Paint Filter Liquids Test), included in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" is not completed on the grit and bar screen debris prior to landfill disposal.

Influent then enters the splitter box which splits the influent equally between two oxidation ditches where aeration and mixing is introduced for reduction or organic content. Next, secondary clarifiers are used for further settling of the sludge. Currently, only one clarifier is being utilized; the second is being cleaned. Ultraviolet disinfection is used to disinfect the effluent. The effluent then travels through a 6" Parshall flume with a secondary flow totalizer into an enclosed pipe and the effluent is then discharged to the El Rito Creek.

Waste activated sludge (WAS) is sent to two aerobic digesters prior to it being placed in one of three sludge drying beds. All underdrains return decant to the headworks for further treatment.

Further Explanations:

Note: The sections are arranged according to Form 3560-3 (USEPA) rather than being ranked in order of importance.

Section A – Permit:

The permit was issued on October 1, 2016 and will expire on September 30, 2021. The capacity of the current facility is 0.454 MGD. The plant, however, has applied for and received a Multi-Sector General Permit (MSGP) from USEPA. The purpose of the Multi-Sector General Permit is to regulate stormwater discharges from facilities (Sector T – Treatment Facilities) that have a design capacity greater than 1 (one) MGD. This facility has a significantly lower design capacity currently at 0.454 MGD. It is unclear to the inspector why the facility applied for and obtained coverage under the MSGP.

Section B – Recordkeeping and Reporting Evaluation: Overall Rating of "**Marginal**"

In Part III, Monitoring Procedures, it states:

"Monitoring must be conducted according to test procedures approved under 40 CFR 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator."

Findings for Recordkeeping and Reporting:

The permittee provided laboratory bench sheets for March 2018. The contract laboratory, Tucumcari Wastewater treatment plant provides analysis of their BOD and E.coli. The chain of custody (COC) does not provide the temperature of the sample upon delivery. Proper preservation and holding times are essential to ensure sample integrity.

Section C – Operation and Maintenance: Overall Rating of "**Unsatisfactory**"

The Permit requires in Part III.B.:

Proper Operation and Maintenance:

a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner that which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

Findings for Operation and Maintenance

The facility has a problem occurring at the headworks. The debris and trash passing through the headworks is flowing through the entire plant and discharging to the El Rito Creek. The permittee stated that the contractor had to retrofit the headworks and this may have led to the issue occurring now. It is imperative for this facility to determine the cause and solution to avoid any further discharges.

Section D – Self-Monitoring: Overall Rating of "**Satisfactory"**

In Part I, Section A, Monitoring and Assessment, it states:

The sample type for Total Suspended Solids (TSS) states that a 3-hour composite sample is required for analysis of TSS.

Findings for Self-Monitoring:

The permittee's bench sheet for TSS states that a "grab" sample was taken for the analysis of TSS.

Section E – Flow Measurement: Overall Rating of **"Marginal**"

In Part III.6 Flow Measures:

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure that accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of 10% from true discharge rates throughout the range of the expected discharge volumes.

Findings for Flow Measurement:

The permittee does not do calibration checks between the primary and secondary devices during the interim of a scheduled calibration from an outside representative (annually). Calibration checks insure that the totalizer has not changed in the accuracy of reliability. Flow measurements are an important part of mass load calculations.

Section F – Laboratory: Overall Rating of "Marginal"

Part III.C of the Permit states:

a. Monitoring must be conducted according to test procedures approved under 40 CFR 136, unless other test procedures have been specified in this permit or approved by the regional administrator.

b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.

c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.

Findings for Laboratory:

On May 18, 2012, EPA published a final rule that approves new methods, or changes to existing methods, that affects over 100 EPA methods, Standard Methods, ASTM methods, and other test procedures in Part 136 of Title 40 of the Code of Federal Regulations (CFR). The rule also contains a number of clarifications relating to approved methods, sample preservation and holding times, and method modifications. Among the more significant changes is a new section 136.7 that would require "essential" quality control activities. The rule will go into effect June 18, 2012.

The methodology being used by the permittee is *Standard Methods for the Examination of Water and Wastewater 18th Edition.* The pH method was approved in 1997 in the 18th Edition. The table below provides the current method approved by 40 CFR 136.

Parameter	Methodology	Approved Standard Methods in Current MUR	Standard Methods 22nd Edition Editorial Updates
28. Hydrogen ion (pH), pH units	Electrometric measurement	4500–H^+-2000	4500–H+-2011
	Automated electrode		

Also included in the May 18, 2012 MUR (Methods Update Rule) is essential quality control:

Essential Quality Control

On June 14, 2012 EPA has provided clarification statement about the new Section 136.7 CFR 40.

With regard to the recent addition of Part 136.7 - Quality Assurance and Quality Control, the intent of the addition of this part was to codify that a permittee or laboratory is required to use suitable QA/QC procedures when conducting CWA compliance analyses.

In cases where methods listed in the tables at 136.3 do not contain QA/QC procedures as a part of the method or the compendium from which the method was taken (e.g., older EPA Methods that were originally published in Methods for the Chemical Analysis of Water and Wastes) , options were given to comply with the QA/QC requirements.

These options included:

1) Referring and following QA/QC published in the "equivalent" EPA Method for that parameter that did contain QA/QC procedures,

2) Referring to the appropriate QA/QC section(s) of an approved Part 136 method from a consensus organization compendium (such as part 1000, 2000, 3000, etc. of Standard Methods), or

3) Incorporating the applicable QA/QC into the laboratory's SOP.

Our intent was not to allow people to "shop around" to determine which QC (and/or acceptance criteria) they wanted to use. The intent was that if a permittee or laboratory is using a method from "Standard Methods for the Examination of Water and Wastes", they would refer to the appropriate section of Standard Methods for QA/QC requirements. All laboratories should have SOPs that document the procedures that they use to analyze samples for various parameters by various methods. If a laboratory's SOP for a analysis of samples for a particular parameter references a method from Standard Methods then the SOP should include the QA/QC requirements and acceptance limits from Standard Methods.

It was not our intent for approved methods with existing QA/QC to be updated to include additional QA/QC procedures. Rather 136.7 address methods that did not contain QA/QC or where the QA was found in a different part of the methods compendium. If an approved method with QA/QC does not contain all 12 elements listed at part 136.7; it is not recommended or required (unless required by the permitting authority) that a laboratory add the missing elements. In many cases this would require a laboratory to establish acceptance criteria for QC elements which are not appropriate for a specific method (e.g., adding MS and MSD tests to a method that measures dissolved oxygen).

It appears from review of the bench sheets provided by the permittee that they do not have a quality control program. The purpose of quality control procedures is to ensure high-quality analyses using control samples, control charts, reference materials, and instrument calibration. The laboratory must initiate and maintain controls throughout the analysis of samples. Specifically, each testing batch must contain at least one blank, standard, duplicate, and spiked (as applicable) sample analysis. When a batch contains more than 10 samples, every tenth sample should be followed by a **duplicate** and a spike (as applicable).

Section H – Sludge Disposal – Overall Rating of "Unsatisfactory"

PART 503—STANDARDS FOR THE USE OR DISPOSAL OF SEWAGE SLUDGE

Subpart A—General Provisions

§ 503.1 Purpose and applicability.

(a) Purpose.

(1) This part establishes standards, which consist of general requirements, pollutant limits, management practices, and operational standards, for the final use or disposal of sewage sludge generated during the treatment of domestic sewage in a treatment works. Standards are included in this part for sewage sludge applied to the land, placed on a surface disposal site, or fired in a sewage sludge incinerator. Also included in this part are pathogen and alternative vector attraction reduction requirements for sewage sludge applied to the land or placed on a surface disposal site.

(2) In addition, the standards in this part include the frequency of monitoring and recordkeeping requirements when sewage sludge is applied to the land, placed on a surface disposal site, or fired in a

sewage sludge incinerator. Also included in this part are reporting requirements for Class I sludge management facilities, publicly owned treatment works (POTWs) with a design flow rate equal to or greater than one million gallons per day, and POTWs that serve 10,000 people or more.

(b) Applicability.

(1) ***This part applies to any person who prepares sewage sludge***, applies sewage sludge to the land, or fires sewage sludge in a sewage sludge incinerator and to the owner/operator of a surface disposal site.

(2) This part applies to sewage sludge applied to the land, placed on a surface disposal site, or fired in a sewage sludge incinerator.

(3) This part applies to the exit gas from a sewage sludge incinerator stack.

(4) This part applies to land where sewage sludge is applied, to a surface disposal site, and to a sewage sludge incinerator.

Definitions:

(y) Store or storage of sewage sludge is the placement of sewage sludge on land on which the ***sewage sludge remains for two years or less.*** This does not include the placement of sewage sludge on land for treatment.

Findings for Sludge Disposal –

This facility has failed to follow general requirements, management practices, and operational standards for their sludge disposal. The operator stated that sludge has not been removed for approximately three years. This has exceeded the time allotted in 40 CFR 503.1(y) and must be properly disposed. The operator has had the sludge analyzed, but final disposal has not occurred. The operator stated he is working on getting the sludge removed and placed at special waste landfill.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Daniel Valenta	Date: 06/21/2018	Time: 10:19 Hours
City/County: Santa Rosa / Guadalupe		State: New Mexico
Location: Santa Rosa WWTP		
Subject: Influent lift station.		

NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Daniel Valenta	Date: 06/21/2018	Time: 10:36 Hours
City/County: Santa Rosa / Guadalupe		State: New Mexico
Location: Santa Rosa WWTP		
Subject: Oxidation Ditch (one of two)		

NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Daniel Valenta	Date: 06/21/2018	Time: 10:52 Hours
City/County: Santa Rosa / Guadalupe		State: New Mexico
Location: Santa Rosa WWTP		
Subject: Clarifier (one of two) – Notice the trees growing inside the inner ring; indication of overloaded clarifier with solids		

NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Daniel Valenta	Date: 06/21/2018	Time: 10:53 Hours
City/County: Santa Rosa / Guadalupe		State: New Mexico
Location: Santa Rosa WWTP		
Subject: Another view of the Clarifier (one of two) – Rising sludge; algae		

NMED/SWQB
Official Photograph Log
Photo # 5

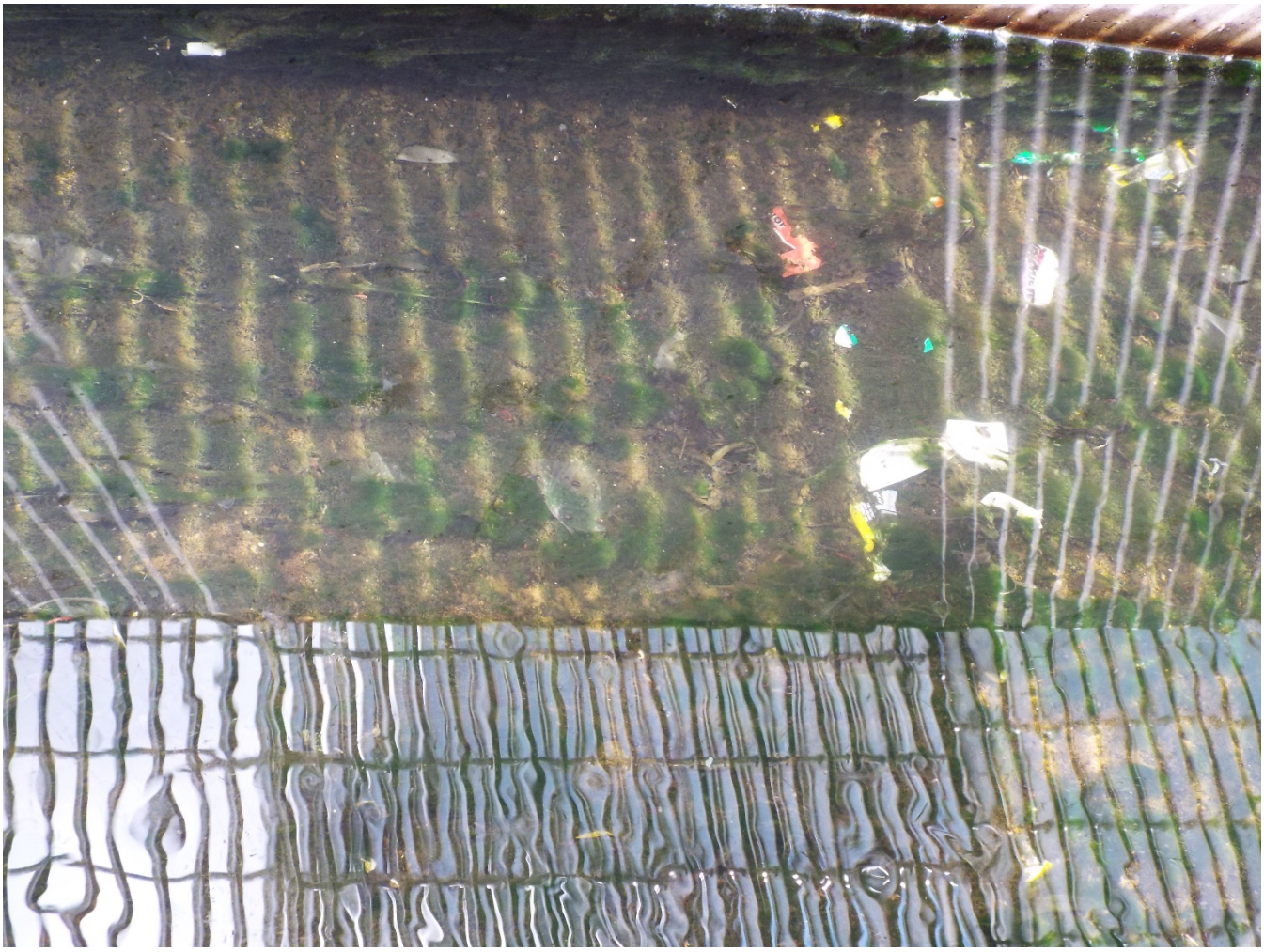
Photographer: Daniel Valenta	Date: 06/21/2018	Time: 10:55 Hours
City/County: Santa Rosa / Guadalupe		State: New Mexico
Location: Santa Rosa WWTP		
Subject: Empty Clarifier, which is not in use at this time – with debris and trash which is not being removed by the grit/barscreen headworks and is traveling to the clarifier(s).		

NMED/SWQB
Official Photograph Log
Photo # 6

Photographer: Daniel Valenta	Date: 06/21/2018	Time: 10:56 Hours
City/County: Santa Rosa / Guadalupe		State: New Mexico
Location: Santa Rosa WWTP		
Subject: Sludge drying beds; middle sludge drying bed has been stored on site for 3+ years.		

NMED/SWQB
Official Photograph Log
Photo # 7

Photographer: Daniel Valenta	Date: 06/21/2018	Time: 11:10 Hours
City/County: Santa Rosa / Guadalupe		State: New Mexico
Location: Santa Rosa WWTP		
Subject: Effluent Channel – debris/trash and algae exiting the facility and entering the El Rito Creek.		



NMED/SWQB
Official Photograph Log
Photo # 8

Photographer: Daniel Valenta	Date: 06/21/2018	Time: 11:12 Hours
City/County: Santa Rosa / Guadalupe		State: New Mexico
Location: Santa Rosa WWTP		
Subject: Parshall flume in the Effluent Channel – debris/trash and algae exiting the facility and entering the El Rito Creek.		

NMED/SWQB
Official Photograph Log
Photo # 9

Photographer: Daniel Valenta	Date: 06/21/2018	Time: 11:21 Hours
City/County: Santa Rosa / Guadalupe		State: New Mexico
Location: Santa Rosa WWTP		
Subject: Effluent entering the El Rito Creek; Foam seen at outfall.